

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
**FILED**

**APR 02 2019**

David J. Bradley, Clerk of Court

**UNITED STATES OF AMERICA**

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**V.**

**CRIMINAL NO. H-18-710-S**

**CLARENCE C. ROLAND, III**  
**a.k.a. Joshua Stein**

**FIRST SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

At all times material to this Indictment:

**COUNT ONE**

(Title 18, U.S.C. § 1349)

**A. INTRODUCTION TO SCHEME TO DEFRAUD**

1. CLARENCE C. ROLAND, III worked in the field of mortgage lending for approximately 17 years as a mortgage broker, with various mortgage lending businesses. In approximately 2009 ROLAND began working with Arlando Jacobs, a former mortgage client and real estate agent, to cancel and challenge mortgage loans held in the name of Jacobs or others. During the scheme, ROLAND frequently used the alias Joshua Stein and Jacobs used the aliases of Caleb Wright and Dexter Ponzey. ROLAND and Jacobs solicited and received the help of other individuals in carrying out the scheme to defraud.
2. ROLAND and Jacobs established, and caused to be established, various business entities to carry out their fraudulent activities.

ENTITY NAME	STAE OF INCORPORATION	DATE OF INCORPORATION
Restorelution Trustee Corporation	Washington	January 12, 2010
Restorelution Reconveyance Corporation	Nevada	April 15, 2010
Canaan Developments, Inc.	Nevada	October 13, 2010

United National Title Company, LLC	Nevada	October 14, 2010
Southwest Security Passthrough LLC	Oklahoma	December 30, 2010
Sooner Trustee Services, LLC	Oklahoma	December 30, 2010
Federal National Services, LLC	Nevada	December 31, 2010
Midwest Regional Pass Through LLC	Nevada	December 31, 2010
National Recovery REO Services, Inc.	Delaware	October 19, 2012
Ananias & Sapphira Investors Group, LLC	Oklahoma	June 14, 2013
Colossians Investors Group, LLC	Nevada	March 12, 2014

3. ROLAND and Jacobs used office space and mailing addresses in the Houston, Texas area in the execution of their scheme to defraud, including 9595 Six Pines Dr., Suite 8210, The Woodlands, Texas, 565 South Mason Rd, Suite 405, Katy, Texas, and 5847 San Felipe, 17<sup>th</sup> Floor, Houston, Texas.

4. In addition to the transactions ROLAND engaged in with Jacobs, he engaged in other fraudulent deed transactions with other scheme participants in order to obtain money.

5. The Federal Deposit Insurance Corporation (FDIC) is an agency of the federal government which insures the deposits of member banks against loss with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions. Bank of New York Mellon, U.S. Bank N. A., First Tennessee Bank, Bank of America and Wells Fargo Bank and their respective branches were each a financial institution the deposits of which were insured by the FDIC.

6. First Horizon Home Loans, a division of First Tennessee Bank, is a mortgage lending business that makes federally related mortgage loans

#### B. FRAUDULENT DEED SCHEME

7. Deed schemes involve the fraudulent acquisition of real property through the manipulation of and filing of fraudulent real property deed documents in the property records of the county in which the real property exists. To accomplish the fraudulent acquisition, numerous other documents are also fabricated and utilized in the scheme to defraud.

8. Title Companies rely on mortgage lenders, and their authorized trustees and servicers, to file property transaction records in the property records of the county in which a specific piece of real property is located. Those records reflect the sale and purchase of the property as well as liens held on the property.

a. Upon the sale of property, the seller of the property executes a Warranty Deed. A Warranty Deed guarantees clear title to the buyer of the property. Statutory Warranty Deeds are used in some states as abbreviated Warranty Deeds which are authorized by statute in those states. Special Warranty Deeds warrant only against defects in title during the seller's time of ownership. Grant Deeds are used for the sale or transfer of real property from one person or entity to another person or entity.

b. Deeds of Trust are executed by the buyer of the property in which a lender funds some or all of the costs of purchase. The Deed of Trust is a deed which reflects that an equitable title in real property was transferred to a trustee, either the lender or a trustee acting on behalf of the lender. The trustee holds the deed as security of the loan between the buyer/borrower and the lender.

9. Subsequent to the purchase/sale transactions additional deeds and records related to the real property can be filed in the county's property records to reflect changes in title or interest, as long as the deeds or documents accurately reflect the intentions of the parties and are authorized by the relevant parties.

10. In fraudulent deed schemes, at least one of the parties is unaware that their title or interest in the real property has been inaccurately reflected in the deed records subsequently filed in the county's property records.

**C. MANNER AND MEANS OF THE SCHEME**

It was part of the scheme that:

11. ROLAND, Jacobs and other scheme participants fabricated documents to defraud mortgage holders by fraudulently transferring the ownership of real property in which the mortgage holder had an interest.

12. ROLAND, Jacobs and other scheme participants fraudulently caused the ownership of real property to appear to have changed by filing, and causing to be filed, a series of documents in the deed records of the county in which the property was located.

13. In order to create the false appearance of actual deed transactions, ROLAND, Jacobs and other scheme participants signed documents claiming to represent certain entities in the transaction described in the document. The same names used as signors on behalf of an entity in one document are used again as signors in other documents. In some instances, the same alleged signors purport to represent different entities.

<b>DATE SIGNED</b>	<b>SIGNOR</b>	<b>ENTITY SIGNING ON BEHALF</b>	<b>PROPERTY</b>
3/1/2013	Connie Benino	Federal National Mortgage Association	402 3 <sup>rd</sup> Ave East
9/3/2013	Connie Benino	First Horizon Homes, a Division of First Tennessee Bank N. A.	3830 Lakewood Parkway East #2137
10/15/2013	Connie Benino	Federal National Services, LLC	1725 Crossroads St.
10/15/2013	Connie Benino	The Bank of New York Mellon FKA The Bank of New York	1725 Crossroads St.
5/1/2013	Angie Garcia	Eagle Bank	402 3 <sup>rd</sup> Ave East
8/15/2013	Angie Garcia	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	3830 Lakewood Parkway East #2137
10/9/2013	Angie Garcia	Southwest Wells Fargo 2006 Corporate Pass-Through Certificates Series 2006	1644 Caminito Barlovento Unit 98
10/15/2013	Angie Garcia	Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006	1725 Crossroads St.
1/5/2014	Angie Garcia	JPMorgan Chase Bank	1725 Crossroads St.
1/22/2014	Angie Garcia	Federal National Services, LLC	1725 Crossroads St.
3/21/2014	Angie Garcia	Federal National Services, LLC	16013 S. Desert Foothills Pkwy #2024
3/21/2014	Angie Garcia	Federal National Services, LLC	3830 Lakewood Parkway East #2137

<b>DATE SIGNED</b>	<b>SIGNOR</b>	<b>ENTITY SIGNING ON BEHALF</b>	<b>PROPERTY</b>
5/21/2014	Angie Garcia	Bayrock Mortgage Corporation, its Successor in Assigns, Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005	802 S. Cajon Ave
2/28/2014	Heather Menendez	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	3830 Lakewood Parkway East #2137
2/28/2014	Heather Menendez	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	16013 S. Desert Foothills Pkwy #2024
3/14/2014	Heather Menendez	Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005	802 S. Cajon Ave
8/25/2014	Jason Stevens	Northwest Eagle Bank 2009 Corporate Pass-Through Certificates Series 2009	402 3 <sup>rd</sup> Ave East
10/23/2014	Jason Stevens	Colossians Investors Group LLC	1377 Mountain View Ln

14. ROLAND, Jacobs and other scheme participants caused documents used in execution of the scheme to defraud to be fraudulently signed and notarized using notary stamps that were acquired for the purpose of using them in the scheme to defraud.

<b>DATE SIGNED</b>	<b>SIGNOR</b>	<b>ENTITY SIGNING ON BEHALF</b>	<b>PROPERTY</b>	<b>NOTARY</b>
3/1/2013	Connie Benino	Federal National Mortgage Association	402 3 <sup>rd</sup> Ave East	F. Vasquez
9/3/2013	Connie Benino	First Horizon Homes, a Division of First Tennessee Bank N. A.	3830 Lakewood Parkway East #2137	Ming Li
10/15/2013	Connie Benino	Federal National Services, LLC	1725 Crossroads St.	Ming Li
10/15/2013	Connie Benino	The Bank of New York Mellon FKA The Bank of New York,	1725 Crossroads St.	Ming Li
5/1/2013	Angie Garcia	Eagle Bank	402 3 <sup>rd</sup> Ave East	F. Vasquez
8/15/2013	Angie Garcia	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	3830 Lakewood Parkway East #2137	F. Vasquez
10/9/2013	Angie Garcia	Southwest Wells Fargo 2006 Corporate Pass-Through Certificates Series 2006	1644 Caminito Barlovento Unit 98	Ming Li
10/15/2013	Angie Garcia	Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006	1725 Crossroads St.	Ming Li
1/5/2014	Angie Garcia	JPMorgan Chase Bank, N.A.	1725 Crossroads St.	F. Vasquez
1/22/2014	Angie Garcia	Federal National Services, LLC	1725 Crossroads St.	Ming Li
3/21/2014	Angie Garcia	Federal National Services, LLC	16013 S. Desert Foothills Pkwy #2024	Ming Li

<b>DATE SIGNED</b>	<b>SIGNOR</b>	<b>ENTITY SIGNING ON BEHALF</b>	<b>PROPERTY</b>	<b>NOTARY</b>
3/21/2014	Angie Garcia	Federal National Services, LLC	3830 Lakewood Parkway East #2137	Ming Li
5/21/2014	Angie Garcia	Bayrock Mortgage Corporation, its Successor in Assigns Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005	802 S. Cajon Ave	Ming Li
2/28/2014	Heather Menendez	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	3830 Lakewood Parkway East #2137	F. Vasquez
2/28/2014	Heather Menendez	Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007	16013 S. Desert Foothills Pkway #2024	F. Vasquez
3/14/2014	Heather Menendez	Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005	802 S. Cajon Ave	F. Vasquez
8/25//2014	Jason Stevens	Northwest Eagle Bank	402 3 <sup>rd</sup> Ave East	F. Vasquez

15. ROLAND and Jacobs created shell companies or alleged trusts to act as the new owners or titleholders of the real property. ROLAND, Jacobs and other scheme participants caused fraudulent deed documents to be filed in the county records which purported to convey title and ownership to these fabricated entities and trusts.

<b>DATE SIGNED</b>	<b>DEED DOCUMENT</b>	<b>PROPERTY</b>
10/16/2011	Grant Deed from K.N.A and H.N. to 10309 Southridge Drive Trust	10309 Southridge Drive
10/9/2013	Grant, Bargain, and Sale Deed from Southwest Wells Fargo 2006 Corporate Pass-Through Certificates Series 2006 to Annanias & Sapphira Investors Group LLC	1644 Caminito Barlovento Unit 98
12/12/2013	Grant, Bargain, and Sale Deed from Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006 to Annanias & Sapphira Investors Group LLC	1725 Crossroads St
2/28/2014	Grant, Bargain, and Sale Deed from Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007 to Annanias & Sapphira Investors Group LLC	3830 Lakewood Parkway East #2137
2/28/2014	Grant, Bargain, and Sale Deed from Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007 to Annanias & Sapphira Investors Group LLC	16013 S. Desert Foothills Parkway #2024
3/14/2014	Grant, Bargain, and Sale Deed from Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005 to Annanias & Sapphira Investors Group LLC	802 S. Cajon Ave West

<b>DATE SIGNED</b>	<b>DEED DOCUMENT</b>	<b>PROPERTY</b>
7/31/2014	Grant Deed from Southwest MCIG Capital 2007 Corporate Pass-Through Certificates Series 2007 to Colossians Investors Group LLC	1377 Mountain View Ln
8/25/2014	Grant, Bargain, and Sale Deed from Northwest Eagle Bank 2009 Corporate Pass-Through Certificates Series 2009 to P&W Property Investments, LLC	402 3 <sup>rd</sup> Ave East

16. ROLAND, Jacobs, and other scheme participants eliminated and attempted to eliminate the security interest that a mortgage lender or lienholder held in real property which had previously been created by a properly filed Deed of Trust.

17. Roland, Jacobs, and other scheme participants caused fraudulent Deeds of Trust to be filed in the county property records which materially misrepresented that an entity ROLAND created or caused to be created for purposes of this fraud scheme had obtained a mortgage for which a real property lien was being recorded in the real property records. The documents filed materially omitted the actual lienholder's interests in the real properties and falsely represented InterBank Loan Servicing Corp had a mortgage lien on the property.

<b>FILING DATE</b>	<b>DEED RECORD</b>	<b>MORTGAGE COMPANY</b>	<b>PROPERTY</b>
3/29/2012	Deed of Trust claiming 10309 Southridge Drive Trust obtained a \$350,000 mortgage	InterBank Loan Servicing Corp c/o United National Title Company 5847 San Felipe, 17 <sup>th</sup> Floor, Houston, TX	10309 Southridge Dr.
11/4/2013	Deed of Trust claiming Annanias & Sapphira Investors Group LLC obtained a \$445,250 mortgage	InterBank Loan Servicing Corp 5847 San Felipe, 17 <sup>th</sup> Floor, Houston, TX	1644 Caminito Barlovento Unit 98
3/11/2014	Deed of Trust claiming Annanias & Sapphira Investors Group LLC obtained a \$91,000 mortgage	InterBank Loan Servicing Corp c/o United National Title Company, 9595 Six Pines Dr, Suite 821, The Woodlands, TX	3830 Lakewood Parkway East #2137
3/12/2014	Deed of Trust claiming Annanias & Sapphira Investors Group LLC obtained a \$111,000 mortgage	InterBank Loan Servicing Corp c/o United National Title Company, 9595 Six Pines Dr, Suite 821, The Woodlands, TX	16013 S. Desert Foothills Pkwy #2024
8/8/2014	Deed of Trust claiming Colossians Investors Group,	InterBank Loan Servicing Corp c/o Southwestern Land Title	1377 Mountain View Ln



	LLC obtained a \$100,000 mortgage	9595 Six Pines Drive, Suite 821 The Woodlands, TX	
9/18/2014	Deed of Trust claiming P&W Properties obtained a \$150,000 mortgage	InterBank Loan Servicing Corp c/o Southwestern Land Title 9595 Six Pines Drive, Suite 821 The Woodlands, TX	402 3 <sup>rd</sup> Ave East

18. After filing a Deed of Trust, ROLAND and Jacobs caused the real properties to be sold, knowing that the title companies would pay off the false mortgage liens to the fabricated entities with the buyer's funds as part of the real estate transactions.

19. The title company assisting in the real estate closing of the real estate sale transaction was provided false and fraudulent information and documents by ROLAND and other scheme participants in furtherance of that sale transaction, including false and fraudulent loan payoff statements. ROLAND frequently used the identity, Joshua Stein, in his interactions with title companies.

DATED	DOCUMENT PRESENTED	PROPERTY
12/4/2013	InterBank Loan Servicing Corp Payoff Statement for Borrower Annanias & Sapphira Inv. Group signed by Joshua Stein as Received and Acknowledged	1644 Caminito Barlovento Unit 98
2/3/2014	Grant Deed from Annanias & Sapphira Investors Group, LLC and signed by Joshua Stein, Executive VP of Sales and notarized by Ming Li	1725 Crossroads St
3/7/2014	Agreement to Purchase Real Estate signed by the Seller, Joshua Stein	16013 S. Desert Foothills Pkway #2024
4/1/2014	InterBank Loan Servicing Corp Payoff Statement for Borrower Annanias & Sapphira Investors Group LLC	16013 S. Desert Foothills Pkway #2024
4/2/2014	Residential Resale Real Estate Purchase Contract signed by the Seller, Joshua Stein of Annanias & Sapphira Investor Group, LLC	3830 Lakewood Parkway East #2137
4/14/2014	InterBank Loan Servicing Corp Payoff Statement for Borrower Annanias & Sapphira Investors Group LLC	3830 Lakewood Parkway East #2137
5/1/2014	California Residential Purchase Agreement and Joint Escrow Instructions signed by the Seller, Joshua Stein of Annanias & Sapphira Investors	802 S. Cajon Ave West
3/30/2015	Resolution of Board of Directors of P&W Property Investments, LLC authorizing the sale of real estate signed Joshua Stein, Secretary of the Corporation	402 3 <sup>rd</sup> Ave East



20. ROLAND, Jacobs and D.N. took a portion of the seller's proceeds from those sales transactions through the fraudulent loan payoffs to InterBank Loan Servicing, Inc.

DEPOSIT DATE	DEPOSIT AMOUNT	RECEIVING BANK ACCOUNT	PROPERTY
8/28/2012	\$44,118.84	Restorelution Reconveyance Corp account xxx2643 at Bank of America	10309 Southridge Dr.
DEPOSIT DATE	DEPOSIT AMOUNT	RECEIVING BANK ACCOUNT	PROPERTY
12/11/2013	\$474,010.00	Federal National Services LLC account xxx7179 at Wells Fargo Bank	1644 Caminito Barlovento Unit 98
4/3/2014	\$61,500.00	National Recovery REO Services, Inc. account xxx6282 at Wells Fargo Bank	16013 S. Desert Foothills Parkway #2024, Phoenix, AZ
4/16/2014	\$71,500.00	National Recovery REO Services, Inc. account xxx6282 at Wells Fargo Bank	3830 Lakewood Parkway East #2137, Phoenix, AZ
10/29/2014	\$100,983.33	Anaias & Sapphira Investors Group LLC account xxx6171 at Bank of America	1377 Mountain View Ln
4/28/2015	\$100,550.00	Midwest Regional Pass Through LLC account xxx7055 at Wells Fargo Bank	402 3 <sup>rd</sup> Ave East

21. ROLAND and Jacobs received fraudulently-obtained proceeds in the form of seller's funds from certain transactions. Bank accounts in the names of entities created for or utilized in the scheme to defraud received the proceeds from these sales transactions.

DATE OF DEPOSIT	DEPOSIT AMOUNT	RECEIVING BANK ACCOUNT	PROPERTY
12/21/2012	\$178,862.24	National Recovery REO Services, Inc. account xxx0796 at Woodforest Bank	422 Windsor Way NE
12/9/2013	\$110,326.43	Anaias and Sapphira Investors Group LLC account xxx6171 at Bank of America	1644 Caminito Barlovento Unit 98
2/13/2014	\$420,968.15	Anaias and Sapphira Investors Group LLC account xxx6171 at Bank of America	1725 Crossroads St.
6/3/2014	\$345,372.74	Anaias and Sapphira Investors Group LLC account xxx6171 at Bank of America	802 S. Cajon Ave
10/29/2014	\$174,975.66	Colossians Investors Group LLC account xxx1263 at Wells Fargo Bank	1377 Mountain View Ln

22. ROLAND, Jacobs and their associates utilized interstate wire communications in the execution of their scheme to defraud, including Email, wire transfers, and electronic transmissions.

D. ACTS IN FURTHERANCE OF THE SCHEME

In furtherance of the conspiracy described in Count One and to effect the objects thereof, the defendant named therein and other persons both known and unknown to the grand jury, performed or caused the performance of one or more of the following Acts, among others not described herein, in the Southern District of Texas and elsewhere on or about the following dates:

1.) The acts set out above in paragraphs 13, 14, 16, 18-20 of this First Superseding Indictment are hereby repeated, re-alleged, and incorporated by reference as though fully set forth herein.

2.) The acts set out below in Counts Two through Four of this First Superseding Indictment are hereby repeated, re-alleged, and incorporated by reference as though fully set forth herein.

3.) December 21, 2011, ROLAND and Jacobs caused a Substitution of Trustee to be filed with the Clerk of the County of San Bernardino, California naming Sooner Trustee Services, LLC of 565 South Mason Road, Suite 405, Katy, Texas as the Trustee under the Deed of Trust for the real property located at 10309 Southridge Drive, Rancho Cucamonga, CA.

4.) March 19, 2012, ROLAND and Jacobs caused a fraudulent Trustee's Deed Upon Sale to be filed in the property records of the County of San Bernardino, California which falsely claimed that 10309 Southridge Drive Trust paid \$400,000 to acquire the real property located at 10309 Southridge Drive, Rancho Cucamonga, CA.

5.) August 15, 2012, Jacobs sent an email to Shamrock Escrow in California which included an InterBank Payoff Demand concerning the real property located at 10309 Southridge Drive, Rancho Cucamonga, CA.

6.) May 14, 2010, ROLAND signed as President-Attorney-in-Fact, the Appointment

of Successor Trustee document in which Jacobs and his wife as Grantors, appointed Restoreloution Trustee Corporation as Successor Trustee under the trust deed for the real property located at 422 Windsor Way NE, Renton, Washington.

7.) December 10, 2012, Jacobs, using the alias “Caleb Wright” of REO Sales, instructed Nextitle to mail any pre-closing conditions and seller documents to 9595 Six Drive, Suite 8210, The Woodlands, Texas for the anticipated real estate closing of the real property located at 422 Windsor Way NE, Renton, Washington.

8.) October 19, 2012, ROLAND and Jacobs caused the incorporation of National Recovery REO Services, Inc. in the State of Delaware.

9.) June 14, 2013, ROLAND caused to be filed a Certificate of Limited Liability Company for Ananias and Sapphira Investors Group, LLC in the State of Oklahoma using the alias “Joshua J. Stein”.

10.) October 1, 2013, ROLAND and Jacobs caused to be filed with the County Recorder of San Diego County, a fraudulent Deed in Lieu of Foreclosure concerning 1644 Caminito Barlovento Unit 98, La Jolla, California, in which the owner of the property purportedly granted the property to Southwest Wells Fargo 2006 Corporate Pass-Through Certificates Series 2006 using the address 565 South Mason Road, Suite 405, Katy, Texas.

11.) December 13, 2013, ROLAND purchased a cashier’s check payable to Clarence Roland in the amount of \$80,000 with funds held in Federal National Services, LLC Expense Account at Wells Fargo Bank, account xxx7179.

12.) December 19, 2013, ROLAND purchased a cashier’s check payable to Clarence Roland in the amount of \$20,000 with funds held in Federal National Services, LLC Expense Account at Wells Fargo Bank, account xxx7179.

13.) October 24, 2013, ROLAND caused a Corporation Assignment of Deed of Trust to be filed in the property records of San Diego County, California alleging to grant, assign and transfer the interest of The Bank of New York Mellon FKA The Bank of New York as trustee on behalf of other named entities in the real property located at 1725 Crossroads St., Chula Vista, CA to Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006.

14.) October 24, 2013, ROLAND caused a Substitution of Trustee document to be filed in the property records of San Diego County, California which falsely claimed to substitute Federal National Services, LLC of 565 South Mason Road, Suite 405, Katy, Texas as the Trustee under the Deed of Trust for the property located at 1725 Crossroads St., Chula Vista, CA on behalf of Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006.

15.) November 22, 2013, ROLAND caused a Deed In Lieu of Foreclosure to be filed in the property records of San Diego County, California in which the owners of the property gave their interest in 1725 Crossroads St., Chula Vista, CA to SCME Mortgage Bankers, Inc., its successor in assigns, Southwest SCME Mortgage 2006 Corporate Pass-Through Certificates Series 2006.

16.) October 9, 2013, ROLAND caused to be filed in the property records of the Maricopa County Recorder, a Deed In Lieu of Foreclosure in which the owners of 16013 S. Desert Foothills Parkway #2024 granted their interest in the real property located at 16013 S. Desert Foothills Parkway #2024, Phoenix, AZ to Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007.

17.) April 1, 2014, ROLAND caused a Warranty Deed concerning the real property located at 16013 S. Desert Foothills Parkway #2024, Phoenix, AZ to be signed in the name of

Joshua J. Stein as a Managing Member of Ananias and Sapphira Investors Group, LLC and caused said signature to be notarized using a State of Texas notary stamp in the name of Ming Li.

18.) September 16, 2013, ROLAND caused to be filed in the property records of the Maricopa County Recorder, a Corporation Assignment of Deed of Trust which falsely claimed that First Horizon Home Loans, a Division of First Tennessee Bank N.A. did grant, assign and transfer their interest in the real property located at 3830 Lakewood Parkway East #2137, Phoenix, AZ to Southwest First Horizon 2007 Corporate Pass-Through Certificates Series 2007 of 565 South Mason Road, Suite 405, Katy, Texas.

19.) April 1, 2014, ROLAND caused to be signed in the name Joshua Stein, an Owner's Affidavit and Indemnity addressed to Equity Title Agency, Inc. regarding their Title Commitment for the property located at 3830 Lakewood Parkway East #2137, Phoenix, AZ.

20.) April 14, 2014, ROLAND caused a Warranty Deed to the new buyer of the real property located at 3830 Lakewood Parkway East #2137, Phoenix, AZ to be signed in the name of Joshua J. Stein as a Managing Member of Annanias and Sapphira Investors Group, LLC and to be notarized using a State of Texas notary stamp in the name of J. Gonzales.

21.) February 28, 2014, ROLAND caused to be signed in the name Angie Garcia as an agent of the lender and caused said signature to be notarized using the State of Texas Notary stamp in the name Ming Li, a Deed In Lieu of Foreclosure which purported to convey the real property located at 802 S. Cajon Avenue, West Covina, CA from the owner to the lender Bayrock Mortgage Corporation, its successor in assigns, Southwest Bayrock 2005 Corporate Pass-Through Certificates Series 2005.

22.) May 8, 2014, ROLAND caused to be signed in the name of Joshua Stein as the Managing Member of Annanias & Sapphira Investors Group, LLC and to be notarized using the

State of Texas notary stamp in the name J. Gonzales, a Grant Deed which purported to grant the real property located at 802 S. Cajon Avenue, West Covina, CA to a new buyer in exchange for valuable consideration.

23.) March 12, 2014, ROLAND caused the creation of Colossians Investors Group LLC in the State of Nevada.

24.) April 25, 2014, ROLAND opened Wells Fargo Bank account xxx1263 in the name of Colossians Investors Group LLC at the Wells Fargo Bank Market Street Branch located at 9595 Six Pines Drive, Suite 300, The Woodlands, Texas.

25.) October 30, 2014, ROLAND caused a wire transfer of \$100,808.99 from the Colossians Investors Group LLC Wells Fargo Bank account xxx1263 to E.R., the original borrower on 1377 Mountain View Lane, Chula Vista, CA.

26.) April 4, 2013, ROLAND caused to be filed in the State of Montana, County of Lake property records a Corporation Assignment of Deed of Trust which falsely claimed that Federal National Mortgage (also known as Fannie Mae) did grant, assign and transfer all beneficial interest in the real property located at 402 3<sup>rd</sup> Avenue East, Polson, Montana to Northwest Eagle Bank 2009 Corporate Pass-Through Certificates Series 2009.

27.) April 4, 2013, ROLAND caused to be filed in the State of Montana, County of Lake property records an Appointment of Successor Trustee which falsely claimed that Northwest Eagle Bank 2009 Corporate Pass-Through Certificates Series 2009 as the Beneficiary under the Deed of Trust concerning the real property located at 402 3<sup>rd</sup> Avenue East, Polson, Montana was substituting Federal National Services LLC of 565 South Mason Road, Suite 405, Katy, Texas as the Successor Trustee.

28.) June 26, 2013, ROLAND caused to be filed in the State of Montana, County of Lake property records a Rescission of Trustee's Deed concerning the real property located at 402 3<sup>rd</sup> Avenue East, Polson, Montana, which was signed using the name Angie Garcia as an agent of Eagle Bank and said signature was notarized using the State of Texas notary stamp in the name of F. Vasquez.

29.) August 8, 2014, ROLAND caused to be filed in the State of Montana, County of Lake property records a Deed In Lieu of Foreclosure which stated that the owner of 402 3<sup>rd</sup> Avenue East, Polson, Montana transferred and conveyed the property to Northwest Eagle Bank 2009 Corporate Pass-Through Certificates Series 2009 of 9595 Six Pines Drive, Suite 8210, The Woodlands, TX.

E. THE CONSPIRACY

23. From in or about 2009 and continuing through on or about April 30, 2015, in the Southern District of Texas and elsewhere, the defendant,

CLARENCE C. ROLAND, III  
a.k.a. Joshua Stein

did knowingly conspire and agree with others known and unknown to the Grand Jury to commit the following offenses against the United States:

a. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used interstate wire communications facilities in carrying out the scheme to defraud, and their actions affected one or more financial institutions, in violation of Title 18, United States Code, Section 1343;

b. To knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions the accounts of which were insured by the Federal Deposit Insurance



Corporation (FDIC), and to obtain money, funds, and property under the custody and control of the financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1349.

**F. THE EXECUTION OF THE SCHEME**

**COUNTS TWO THROUGH FOUR**  
(Title 18, U.S.C. § 1343)

24. The allegations contained in paragraphs 1 through 22 and D 3 through 29 as set out in Count One of this First Superseding Indictment are hereby repeated, re-alleged, and incorporated by reference as though fully set forth herein.

25. On or about the following dates, in the Southern District of Texas and elsewhere, the defendant, CLARENCE C. ROLAND, III a.k.a. Joshua Stein, for the purpose of executing the above-described scheme to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and attempting to do so, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce the following writings, signals, and sounds:

<b>COUNT</b>	<b>DATE</b>	<b>WIRE COMMUNICATION</b>	<b>PROPERTY</b>
2	June 2, 2014	Email from jjstein777@gmail.com to EscrowNet in California relaying the bank account number to wire seller proceeds from the sale of 802 S. Cajon Avenue, West Covina, CA	802 S. Cajon Ave, West Covina, California
3	October 29, 2014	Fax from Texas to Elite Escrow in California of an Interbank Loan Servicing Corp payoff statement for the real estate closing of 1377 Mountain View Lane	1377 Mountain View Lane, Chula Vista, California
4	April 22, 2015	Fax from Texas to First American Title Company of Montana, Inc. in Montana an Interbank Loan Servicing Corp Payoff Statement for the real estate closing of 402 3 <sup>rd</sup> Ave East, Polson, Montana	402 3 <sup>rd</sup> Avenue East, Polson, Montana

All in violation of Title 18, United States Code, Section 1343 and 2.

**COUNTS FIVE THROUGH TEN**

(Title 18, U.S.C. § 1957(a))

26. The allegations contained in 1 through 22 and D 3 through 29 of this First Superseding Indictment are hereby repeated, re-alleged, and incorporated by reference as though fully set forth herein.

27. On or about the following dates, in the Southern District of Texas and elsewhere, the defendant, CLARENCE C. ROLAND, III a.k.a. Joshua Stein, did knowingly cause and engage in, and attempt to engage in, monetary transactions affecting interstate commerce in criminally derived property of a value greater than \$10,000, such funds having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

COUNT	DATE	MONETARY TRANSACTION	PROPERTY
5	April 17, 2014	Withdrawal of \$29,200 from Wells Fargo Bank account xxx6282 held in the name of National Recovery REO Services, Inc.	3830 Lakewood Parkway East #2137 Phoenix, Arizona
6	October 30, 2014	Withdrawal of \$37,800 from Wells Fargo Bank account xxx1263 held in the name of Colossians Investors Group LLC	1377 Mountain View Lane, Chula Vista, California
7	October 30, 2014	Purchase of Wells Fargo Bank Cashier's Check 6844601882 payable to "Vitruous Women Ministries" in the amount of \$22,800.	1377 Mountain View Lane, Chula Vista, California
8	October 30, 2014	Purchase of Wells Fargo Bank Cashier's Check 6844601883 payable to Clarence Roland in the amount of \$15,000	1377 Mountain View Lane, Chula Vista, California
9	April 28, 2015	Withdrawal of \$21,000 in cash from Wells Fargo Bank account 7055 held in the name of Midwest Regional Pass Through LLC	402 3 <sup>rd</sup> Avenue East, Polson, Montana
10	April 30, 2015	Purchase of Wells Fargo Bank Cashier's Check 6847901014 payable to Clarence Roland in the amount of \$50,000	402 3 <sup>rd</sup> Avenue East, Polson, Montana

All in violation of Title 18, United States Code, Section 1957(a) and (b)(1).

**NOTICE OF FORFEITURE**

**18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2); 28 U.S.C. § 2461(c)**

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2) the United States gives notice to defendant

CLARENCE C. ROLAND, III  
a.k.a. Joshua Stein

that upon conviction of the offenses charged in Counts One through Four, all property constituting, or derived from, proceeds obtained directly or indirectly as a result of such violation is subject to forfeiture.

**NOTICE OF FORFEITURE**

**18 U.S.C. § 982(a)(1)**

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to defendant

CLARENCE C. ROLAND, III  
a.k.a. Joshua Stein

that upon conviction of the offenses charged in Counts Five through Ten, all property, real or personal, involved in money laundering offenses or traceable to such property, is subject to forfeiture.

**Property Subject to Forfeiture**

The property subject to forfeiture includes, but is not limited to, approximately \$2,148,277.78.

**Money Judgment and Substitute Assets**

The defendant is notified that upon conviction, a money judgment may be imposed against him. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p)

exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture.

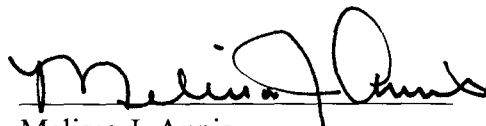
A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Melissa J. Annis", written over a horizontal line.

Melissa J. Annis  
Assistant United States Attorney